LENOX
CHINA · CRYSTAL

POMONA NEW JERSEY 08240

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)283- January 3, 198

Ernest A. Regna, Chief Solid Waste Branch U.S. Environmental Protection Agency 26 Federal Plaza, Room 905 New York, New York 10278

> RE: Part B, RCRA Permit Application Facility in Pomona, New Jersey EPA ID No. NJD002325074

Dear Mr. Regna:

Our Part B, RCRA Permit Application is under review in the draft stage. We will submit the application in its finalized form on or before February 15, 1984.

Very truly yours,

AL

A.J. Sustray Director,

Facilities Engineering

AJG/pm Enclosure

m/o enclosure 01/07/99-KOM

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MT PLEASANT. PENNSYL

CC: Frank Coolick, Chief
Bureau of Engineering Review and Permits
Division of Waste Management
New Jersey Department of Environmental Protection
32 East Hanover Street
Trenton, New Jersey 08625

John J. Trela, Chief Groundwater Permits Review Bureau of Groundwater Management Division of Water Resources CN 029 Trenton, New Jersey 08625

Richard J. Sullivan
New Jersey First, Inc.
Route 31 Professional Building
2490 Pennington Road
Trenton, New Jersey 08638

John Isbister, V.P. Geraghty & Miller, Inc. N. Shore Atrium 6800 Jericho Turnpike Syosset, New York 11791

Erhardt Werth Geraghty & Miller, Inc. N. Shore Atrium 6800 Jericho Turnpike Syosset, New York 11791

	PHONE CALL DISCUSSION FIELD TRIP CONFERENCE		
RECORD OF COMMUNICATION	OTHER (SPECIFY)		
	(Record of item checked above)		
To: File	Tom lacene, SWB 10:30am		
NJD 002325074	Tim lacene, SWB 10:30am		
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Lenox China wwo	required to submit a Part B		
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that its Pat ?	A by letter dated January 3, 1984		
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CONCLUSIONS, ACTION TAKEN OR REQUIRED	o Part B buy 2/15/84 to also state this		
	in writing with reasons.		
INFORMATION COPIES TO:	Naste & Toxic Substances Branch		

pesu -February 14, 1984

Ernest A. Regna, Chief Solid Waste Branch U.S. Environmental Protection Agency 26 Federal Plaza, Room 905 New York, New York 10278

> RE: Lenox China Plant, Pomona, NJ EPA ID No. NJD002325074

Dear Dr. Regna:

Transmitted herewith are six copies of our RCRA Part B Permit Application.

Please note in Section 17 of the Financial Assurance submission (Section 12 of Permit Application) and Trust Agreement that Lenox has set a standard for the termination of the Trust Fund.

Inquiries and questions concerning this RCRA Part B Permit Application should be directed to my attention at:

> Lenox China Tilton Road Pomona, New Jersey 08240 Tel: (609) 641-3700 (Ext. 335)

Facilities Engineering

AJG/pm

CC: Mr. Joel Golumbek, Chief /
N.J./Caribbean Hazardous Waste Section
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10278

Mr. Robert Gantzer
N.J./Caribbean Hazardous Waste Section
Solid Waste Branch
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10278

Mr. Frank Coolick, Chief Bureau of Engineering and Permits NJ Dept. of Environmental Protection 32 East Hanover Street Trenton, NJ 08625

Mr. Richard J. Sullivan New Jersey First, Inc. Route 31 Professional Bldg. 2490 Pennington Road Trenton, NJ 08638 Mr. John J. Trela, Chief Groundwater Permits Review Bureau of Groundwater Management Division of Water Resources CN-029 Trenton, NJ 08625

Mr. Erhardt Werth Geraghty & Miller, Inc. North Shore Atrium 6800 Jericho Turnpike Syosset, NY 11791





POMONA NEW JERSEY 08240

7€84- March 6, 1984

Conrad Simon, Director Air & Waste Management Division U.S. Environmental Protection Agency Region II 26 Federal Plaza New York, New York 10278

> RE: Lenox China Plant, Pomona, NJ EPA ID No. NJD002325074

Dear Mr. Simon:

Reference your March 1 letter (copy attached) requesting a written closure plan and a closing cost estimate together with a post—closure plan and a separate cost estimate for post—closure monitoring and maintenance.

This information is included in Section 12 of the Lenox China RCRA Part B Permit Application submitted to Mr. E.A. Regna, Chief, Solid Waste Branch, USEPA on February 13, 1984.

In telecon with Ms. Barbara Kropf on March 6, I advised that six copies of the Lenox China Part B Permit Application were hand delivered to Mr. Regna's office at USEPA, Region II, 26 Federal Plaza, New York City, NY and we have a signed receipt acknowledging delivery.

Apparently, there has been some sort of an administrative mix—up and a lack of proper communication. Ms. Barbara Kropf advised no action is required on our part other than this letter of response.

Very truly yours,

Director.

Facilities Engineering

AJG/pm Attachment

NEW YORK, N.Y. REGION LI REGION LI REGION LI

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AIR & WASTE-MANAGEMENT

MT PLEASANT, PENNSYLVANI

CC: Shelly Erlech Holm
Air & Waste Management Division
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10278

Barbara Kropf Air & Waste Management Division U.S. Environmental Protection Agency Region II 26 Federal Plaza New York, New York 10278

Ernest A. Regna, Chief Solid Waste Branch U.S. Environmental Protection Agency 26 Federal Plaza, Room 905 New York, New York 10278

Joel Golumbek, Chief NJ/Caribbean Hazardous Waste Section U.S. Environmental Protection Agency Region II 26 Federal Plaza New York, New York 10278

Robert Gantzer
NJ/Caribbean Hazardous Waste Section
Solid Waste Branch
U.S. Environmental Protection Agency
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New York, New York 10278

Frank Coolick, Chief Bureau of Engineering and Permits NJ Dept. of Environmental Protection 32 East Hanover Street Trenton, NJ 08625

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# State of New Jersey DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT 32 E. Hanover St., CN 028, Trenton, N.J. 08625

DR. MARWAN M. SADAT, P.E. DIRECTOR

LINO F. PEREIRA, P.E. DEPUTY DIRECTOR

A.J. Gustray, Director Facilities Engineering Lenox China, Inc. Tilton Road Pomona, New Jersey 08240 PERS-18 MAR 1985

NJD002325074

RE: Extension Request of March 5, 1985, Submitted by Geraghty & Miller, Inc.

Dear Mr. Gustray:

The Bureau of Hazardous Waste Engineering has received a letter of March 5, 1985 from Erhardt Werth, Geraghty & Miller, Inc. requesting a one month extension to submit additional information for the Part B permit application. The Bureau hereby grants an extension to April 5, 1985 for the information requested in the letter dated December 6, 1984. This extension is granted due to the quantity of information requested and the level of the effort necessary to develop such information.

Very truly yours,

Frank Coolick, Chief

Bureau of Hazardous Waste Engineering

EP7:1k

cc: Kathy Lapham, DWR Nancy Seldin, DWM

Angel Chang, USEPA, Region II

LENOX CHINA · CRYSTAL

POMONA NEW JERSEY 08240

**P35-** April 17, 1985

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Frank Coolick, Chief
Bureau of Hazardous Waste Engineering
Division of Waste Management
New Jersey Department of
Environmental Protection
32 East Hanover Street
Trenton, New Jersey 08625

Received 5/14/85

Re: Revised Part B Application, Lenox China, Pomona, New Jersey

Dear Mr. Coolick:

In accordance with the December 6, 1984 request from your office, we are enclosing additional information in support of the RCRA Part B/New Jersey Hazardous Waste Facility Permit Application for Lenox China's Pomona, New Jersey plant. Lenox China has made a diligent effort to develop and supply as much information as possible with the time allotted by the NJDEP.

If there were any changes in a section, we have provided a complete new section. Enclosed are the following revised sections:

Section	1 .	Section	11
Section	· <b>2</b>	Section	12
Section	3	Section	13
Section	·5	Section	14
Section	6	Section	15
Section	7	Section	16
Section	8	Section	17

Existing sections with these numbers should be discarded and replaced with the enclosures.

Unchanged, and therefore <u>not</u> provided are the following:

Section	4			Section	18
Section	9			Section	19
Section	10	٠.	-	Section	20

The considerable scope of additional field work requested by the NJDEP and the related problems of contractor availability and timely reporting of analytical results have delayed the submission of a small number of items specified in the administrative check list (Attachment 3 to the December 6, 1984 letter).

A description of the outstanding information along with an estimate of the additional time required to obtain/develop this information is provided below.

#### 1. Facility Description (Items B-2a/B-2b).

None of the existing contour maps available to Lenox China is considered suitable by the NJDEP for use as a base map to describe the facility; therefore, Lenox must prepare a new map for this purpose. This involves the use of aerial photography coupled with stringent ground control/surveying measures. The detailed elevation data obtained in this manner must be reduced (usually by computer) and mapped in a final form. This entire process can be expected to take two to four months to complete. Moreover, the ability to perform the aerial photography work is highly dependent upon weather conditions.

Lenox China has retained Topographic Data Consultants, Inc., Berlin, New Jersey to perform this work and anticipates that the necessary contour map may be available by June 15, 1985. Once the new contour-base map is available, another one to two weeks will be required to add the various components such as ground-water flow patterns, facility boundaries, runoff control systems, and storm and sanitary sewers to the map as specified by the permit requirements.

### 2. Facility Siting Information (Item B-3b).

The set of the Federal Insurance Administration (FIA) flood maps examined for the preparation of the original permit application have been superceded. Personal communications with FIA personnel indicate that the new flood map for the site, which is currently on back order, continues to show that no portion of the plant is located within the 100-year floodplain boundary. It is anticipated that the new map will be available from FIA within the next two weeks.

#### 3. Hazardous Waste Characterization (Item C-1).

Lenox China has selected and contracted a chemical laboratory (Measurement Sciences Corporation of Garden City, New York), and representative waste samples were recently collected for analysis. Waste samples are currently being analyzed for those chemical constituents anticipated to be in waste stream, EP toxicity testing for metals, and a GC/MS scan for volatile organics in the trichloro-ethylene sludge stored on site in drums. The results of this analytical work should be available in six to eight weeks.

## 4. Certification of Dike Integrity (Items D-4f(1) through D-4f(6)).

Lenox has retained the services of the engineering firm of E.P. Ryan Associates, Inc., of Pleasantville, New Jersey to evaluate the integrity of dikes around the Slip Basin and Polishing Basin. Development of this information should take approximately six weeks.

5. Forms related to the Alternative Information Statement, the Affadavit of Exemption and the Solid Waste Supplement to Standard Application Form CP #1 are under review by our legal staff for compilation of all required corporate information. The completed forms will be forwarded under separate cover within the next three weeks.

Lenox China will submit this outstanding information to the NJDEP under separate cover as soon as the data for each of these items becomes available and/or has been evaluated to characterize site conditions as required by the permit.

NJDEP Standard Application Form CP #1 is enclosed together with a \$550. check to cover the RCRA Part B Permit engineering design review and registration fee.

Sincerely

A.J Gustray

Diroctor,

Facilities Engineering

AJG/pm Enclosures (4)

ures (4) w/o enclosures 01/07/99 - KOM CC: Mr. Ernest A. Regna, Chief Solid Waste Branch U.S. Environmental Protection Agency 26 Federal Plaza, Room 905 New York, New York 10278

Mr. Joel Golumbek, Chief 
N.J./Caribbean Hazardous Waste Section
U.S. Environmental Protection Agency
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26 Federal Plaza
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